

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION AT COLUMBUS**

United States of America,	:	
Plaintiff	:	JUDGE WATSON
-vs-	:	Case No. 2:21-CR-239
Kevin Daniels	:	

**DEFENDANT KEVIN DANIELS' MOTION FOR
CONTINUANCE OF THE JURY TRIAL DATE**

Now comes Defendant Kevin Daniels, by and through counsel, and respectfully request a continuance of the Trial Date scheduled for Monday February 7, 2022 at 9:00 a.m. The reasons for this request are set forth more fully in the attached Memorandum in Support.

Respectfully submitted:

/s/ Susan Pettit

Susan Pettit (0067613)
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MEMORANDUM IN SUPPORT

This Court has scheduled the Trial Date for this matter on February 7, 2022. Counsel is requesting a continuance of this date because after reviewing all discovery provided, counsel has been unable to meet with Mr. Daniels. Mr. Daniels is housed in the

Franklin County Workhouse. Due to the overwhelming number of Covid-19 cases in the Franklin County Jail and Workhouse, professional visits had been limited to non-contact visits. However, counsel has recently learned that Mr. Daniels has been placed on “move restriction” for an estimated 14 days. Consequently, Mr. Daniels has not had the ability to discuss the discovery with counsel. As a result, counsel and the AUSA Sheila Lafferty have not been able to discuss the possibilities of resolving this matter short of trial.

Counsel has spoken with Assistant U.S. Attorney Sheila G. Lafferty, and she does not oppose this continuance. Also, counsel for the government has several trials scheduled through late in April to early in May 2022. If the Court directs, counsel can have a meeting to discuss trial dates.

WHEREFORE, counsel for Defendant Kevin Daniels requests a continuance of the Trial Date of Monday, February 7, 2022 at 9:00 a.m. This continuance will not disadvantage the defendant and would be in the best interest of judicial economy.

Counsel has not been able to discuss this continuance with Mr. Daniels because of his restricted status at the Franklin County Workhouse.

Respectfully submitted:

/S/ Susan Pettit

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CERTIFICATE OF SERVICE

Counsel hereby certifies that a true copy of the foregoing Motion for Continuance was served the 14th day of January, 2022, electronically on the Assistant U.S. Attorney

/S/ Susan Pettit

Susan Pettit (0067613)

Counsel for Defendant Kevin Daniels